

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

Keri Lee Rojas

PRINCIPAL

YOB:

1984

United States

United States District Court
Southern District of Texas
FILED

AUG 11 2016

CRIMINAL COMPLAINT

Case Number:

M-16-1508 -M

(Name and Address of Defendant)

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 10, 2016 in Starr County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Eri Rosario-Rojas, a citizen and national of Mexico, who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said alien in furtherance of such violation of law within the United States, that is, from a location near Laredo, Texas to the point of arrest near La Grulla, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On August 10, 2016, at approximately 4:30 pm, Border Patrol Agent R. Muniz, observed a grey GMC Envoy travelling at a high rate of speed and weaving in and out of traffic within the city limits of Rio Grande City, Texas. Agent Muniz notified DPS regarding the erratic driving, and Trooper Sustaita responded. Trooper Sustaita stopped the GMC Envoy for failure to move over for certain stationary vehicles. According to Trooper Sustaita, another Trooper had a vehicle stopped alongside Highway 83, and the driver of the Envoy failed to slow down and/or move out of the right lane of traffic.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved by: Linda Revarez, ANSA
8/11/16

Signature of Complainant

Sworn to before me and subscribed in my presence,

August 11, 2016

Date

Derek Conrow

Senior Patrol Agent

Printed Name of Complainant

at McAllen, Texas

City and State

Diana S. Quiroga

U. S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-16- 1508 -M

RE: Keri Lee Rojas

CONTINUATION:

Agents responded to assist the Trooper, and discovered the driver, USC Keri Lee ROJAS, was travelling with her 14 year old daughter and one illegal alien.

All three people were transported to the Rio Grande City station for processing.

PRINCIPAL STATEMENT:

Keri Lee ROJAS was read her rights. She stated she was willing to provide a statement without the presence of an attorney.

ROJAS admitted she knew the person in the back seat was illegally in the United States. She also stated she was going to be paid to smuggle him from Laredo, Texas to McAllen, Texas, but did not know how much. Her ex-husband hired her to do the job.

NOTE: ROJAS was charged with alien smuggling in 2009, but was convicted of 1325 Aiding and Abetting the illegal entry of an illegal alien.

MATERIAL WITNESS'S STATEMENT:

Eri Rosario-Rojas was read his rights. He stated he was willing to provide a statement without the presence of an attorney.

Rosario, a citizen of Mexico, claimed he was charged to be smuggled into the United States. He stated, after illegally crossing the river, he was kept at various stash houses for four months. The caretaker of the last stash house told Rosario what type of vehicle to expect to pick him up. When the vehicle arrived, the driver motioned to him to board the vehicle. Rosario told agents the driver told him to say they were headed to Kansas City to visit a friend if they were stopped by law enforcement